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USEPA Region 5
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Subject
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (May 2008)

INDUSTRIAL

Date
June 16, 2008

Contact
Steve Garbaciak

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312.332.4937 ext. 12

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Our ref
B0064530.014

Dear Mike:

Attached is the 15th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Stephen Garbaciak Jr., P.E.
Vice President

Copies
Samuel Borries, USEPA
Paul Bucholtz, MDEQ
James Saric, USEPA
Jeff Keiser, CH2M HILL
J. Michael Davis, Esq., Georgia-Pacific Corporation
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MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT

REPORT #15, MAY 2008

PREPARED BY ARCADIS
JUNE 16, 2008

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #15, MAY 2008

Significant Developments and Activities During the Period

- On May 1, the Michigan Department of Natural Resources (MDNR) informed the Kalamazoo River Study Group (KRSG) that they would be onsite on May 8 to observe the restoration activities conducted in Removal Areas 1 through 8.

- On May 2, the KRSG submitted a Subcontractor Qualification Notification for Bidco Marine Group to the United States Environmental Protection Agency (USEPA), as required by Paragraph 11 of the TCRA AOC.

- On May 6, the KRSG submitted a copy of the *45th Weekly Construction Report for the Plainwell TCRA* to USEPA and the Michigan Department of Environmental Quality (MDEQ).

- On May 6, the KRSG submitted to MDNR a list of potential locations in which posters could be placed to inform the public of the Kalamazoo River closure.

- On May 7, 20, and 30, the KRSG received copies of analytical data for the polychlorinated biphenyl (PCB) soil confirmation split samples collected by USEPA.

- On May 8, the KRSG submitted *Addendum 4, Diving Operations, to the Multi-Area Health and Safety Plan (Rev. 1) for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site* to USEPA and MDEQ

- On May 12, 14, and 28, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.

- On May 12, the KRSG received copies of analytical data for the total petroleum hydrocarbon (TPH) samples collected by USEPA in Removal Area 6B in April.

- On May 12, the KRSG submitted to USEPA and MDEQ correspondence from Consumers Energy and Michigan Gas Utilities regarding excavation near the underground utility pipelines.

- On May 12, the KRSG received written direction from the USEPA to modify the bank sampling procedure to include all material from the top of bank to the toe of slope and to excavate Removal Area 11B.

- On May 13, the KRSG submitted a copy of the *46th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #15, MAY 2008

- On May 15, the KRSG submitted the *14th Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for April 2008 to USEPA.

- On May 15, the KRSG received direction from MDNR that the access roads developed as a part of TCRA activities are to be removed at the conclusion of restoration activities.

- On May 21, the KRSG, USEPA, and MDNR attended the Monthly Stakeholder's Meeting in Plainwell.

- On May 21, the KRSG submitted a copy of the *47th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On May 22, the KRSG submitted a revised approach to the bank stabilization plan for eroded areas in Removal Areas 6B and 7B to USEPA and MDEQ. USEPA tentatively approved the plan on May 30. The KRSG is expecting final approval during the week of June 2

- On May 23, the KRSG submitted the 2008 *Traffic Control Plan* (TCP) to USEPA, MDEQ, the City of Plainwell, and the City of Otsego.

- On May 27, at the request of USEPA, the KRSG submitted a copy of the *1st Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for February/March 2007.

- On May 27, the KRSG submitted a copy of the *48th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ

- On May 28, MDNR submitted to the KRSG photos of the water control structure (WCS), taken during the Monthly Stakeholder's Meeting on May 21.

- On May 28, MDNR submitted to the KRSG a flyer regarding a privately-sponsored kayak race that is scheduled to take place on July 19

- On May 30, MDNR contacted the sponsor of the kayak race to confirm that the course would not be located in the section of the river closed for TCRA work activities.

Data Collected and Field Activities Conducted During the Period

- During the week of May 1, the KRSG continued excavating in Removal Areas 9A, 10B, and Upland Area 10B1, began planting trees and shrubs in Removal Areas 1 through 8, continued removing the Phase 1 Cofferdam, and installed the water treatment system at Staging Area 4N. Two surface water samples (TS30016 and TS30017) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 10B for PCB analysis. A rinse blank (TS30018) was also

collected. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of May 5, the KRSG began excavating soil/sediment in Removal Area 10A, continued excavating in Removal Areas 9A, 10B, and Upland Area 10B1, began removing floodplain soils from the upland areas on the north side of the river, continued planting trees and shrubs in Removal Areas 1 through 8, began seeding restoration activities in Removal Area 9A, and conducted scour monitoring in Mid-Channel Areas A and B. Twenty-six floodplain and bank soil samples (TS20024 through TS20026, TS20028 through TS20046, and TS20048 through TS20051) were collected from Removals Areas 9A, 9B, 10B, and Upland Area 10B1. Two duplicate samples (TS20027 and TS20047) were also collected. The USEPA collected split samples of TS20028 (APS-050508-16-SD/TS20028) and TS20044 (APS-050808-17-SD/TS20044). Four surface water samples (TS30019 through TS30022) were collected from locations 300 feet downstream and 200 feet upstream of Removal Areas 9A and 10B for PCB analysis. A rinse blank (TS30023) was also collected. Wastewater samples W_SA3S_Influ_0053 (influent port), W_SA3S_MidA_0048 (mid-point port, right side), W_SA3S_MidB_0052 (mid-point port, left side), W_SA3S_EffluA_0048 (effluent port, right side) and W_SA3S_EffluB_0052 (effluent port, left side) were collected from the 25 gallon per minute (GPM) water treatment system located at Staging Area 3S prior to discharge. A duplicate of sample W_SA3S_EffluB_0052 (W_SA3S_Dup_0012) was also collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of May 12, the KRSG continued excavating in Removal Areas 9A and 10A, continued floodplain soil removal activities in the upland areas on the north side of the river, continued planting trees and shrubs in Removal Areas 1 through 8 and 9A, began backfilling Upland Area 10B1, conducted scour monitoring in Mid-Channel Areas A and B, and began removing stop logs from the WCS. The water elevation remained above the water elevation of the spillway. Eight floodplain and bank soil samples (TS20052 through TS20059) were collected from Removal Area 9A. The USEPA collected a split sample of TS20052 (APS-051408-18-SD/TS20052). Two surface water samples (TS30024 and TS30025) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 9A for PCB analysis. A duplicate sample (TS30026) and rinse blank (TS30027) were also collected. Wastewater samples W_SA4N_Influ_0001 (influent port), W_SA4N_MidA_0001 (mid-point port, right side), W_SA4N_MidB_0001 (mid-point port, left side), W_SA4N_EffluA_0001 (effluent port, right side) and W_SA4N_EffluB_0001 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 4N prior to discharge Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #15, MAY 2008

- During the week of May 19, the KRSG continued excavating in Removal Area 10A and Mid-Channel Area C, continued grading activities in the upland areas on the north side of the river, probed the floodplain around natural gas utility lines in Removal Area 10, conducted scour monitoring in Mid-Channel Areas A and B, and operated the WCS. Six floodplain and bank soil confirmation samples (TS20060 through TS20065) were collected from Removal Area 10A and submitted for PCB analysis. Two surface water samples (TS30028 and TS30029) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 10A for PCB analysis. A rinse blank (TS30030) was also collected. Table A summarizes the samples collected Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- During the week of May 26, the KRSG continued excavating in Removal Areas 10A, 10B, 11A, and 11B, began removing haul roads in Removal Areas 2 through 5, conducted scour monitoring in Mid-Channel Areas A and B, and continued to operate the WCS. Three floodplain soil confirmation samples (TS20066, TS20068, and TS20069) and one duplicate sample (TS20067) were collected from Removal Areas 10B and 11A and submitted for PCB analysis. The USEPA collected split samples of TS20068 (APS-052908-19-SD/TS20068) and TS20069 (APS-052908-20-SD/TS20069). Two surface water samples (TS30031 and TS30032) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 10A for PCB analysis. A rinse blank (TS30033) was also collected. Wastewater samples W_SA4N_Influ_0002 (influent port), W_SA4N_MidA_0002 (mid-point port, right side), W_SA4N_MidB_0002 (mid-point port, left side), W_SA4N_EffluA_0002 (effluent port, right side) and W_SA4N_EffluB_0002 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 4N prior to discharge Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- As of May 31, approximately 60,000 cubic yards of material had been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, 9A, 9B, 10B, 11A, 11B, 13B, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1, 6B1, 10B1, 11A1, and 12A1, and Islands 1, 2 and 3.

Laboratory Data Received During the Period

- No analytical data were received during the week of May 1.

- During the week of May 5, the KRSG received analytical data for soil confirmation samples TS20024 through TS20051, USEPA split sample APS-050508-16-SD/TS20028, surface water samples TS30010 through TS3012 (collected in April), and wastewater samples W_SA3S_Influ_0053,

W_SA3S_MidA_0048, W_SA3S_MidB_0052, W_SA3S_EffluA_0048, W_SA3S_EffluB_0052 and W_SA3S_Dup_0012.

- During the week of May 12, the KRSG received analytical data for soil confirmation samples TS20052 through TS20059 and surface water samples TS30013 through TS30015 (collected in April).

- During the week of May 19, the KRSG received analytical data for soil confirmation samples TS20060 through TS20065, USEPA split samples APS-050808-17-SD/TS20044 and APS-051408-18-SD/TS20052, surface water samples TS30016 through TS30023, and wastewater samples W_SA4N_Influ_0001, W_SA4N_MidA_0001, W_SA4N_MidB_0001, W_SA4N_EffluA_0001 and W_SA4N_EffluB_0001.

- During the week of May 26, the KRSG received analytical data for soil confirmation samples TS20066 through TS20069, USEPA split samples APS-052908-19-SD/TS20068 and APS-052908-20-SD/TS20069, and surface water samples TS20024 through TS20027.

- The KRSG is awaiting analytical results for surface water samples TS30028 through TS30033 and wastewater samples W_SA4N_Influ_0002, W_SA4N_MidA_0002, W_SA4N_MidB_0002, W_SA4N_EffluA_0002 and W_SA4N_EffluB_0002.

Issues Encountered and Actions Taken

- During the week of April 7, the KRSG submitted a proposal to revise the stabilization method for the eroded bank in Removal Areas 6B and 7B; the proposal calls for stabilizing the bank with river run rock During the week of April 29, USEPA informed the KRSG that minimal rock should be used in the area, and that the bank should be rebuilt. On May 22, the KRSG submitted a revised approach to the bank stabilization plan to USEPA and MDEQ that addressed USEPA's comments. USEPA tentatively approved the plan on May 30 The KRSG is expecting final approval during the week of June 2.

- On May 1, during the removal of near-shore sediments in Removal Area 9A, sand and cobbles were encountered above the design grade elevation in the upstream portion of the near-shore sediment removal area. The USEPA agreed that the native riverbed had been encountered and, in accordance with the Former Plainwell Impoundment TCRA Design Report (design report), no further excavation was necessary.

- On May 7, during the removal of floodplain soils in Removal Area 9A, a lens of gray material was encountered below the design grade elevation. The material was removed and the area backfilled to maintain a stable slope. The MDEQ collected two samples of this material before the additional excavation could occur. These samples were not submitted for laboratory analysis.

- On May 8, two soil confirmation samples were collected from Removal Area 10B, Grids 5 (banks sample [BS]) and 6 (BS) (TS20051 and TS20050, respectively) and submitted for PCB analysis. However, these two grids had already been sampled on April 29 (TS20023 and TS20022, respectively). A PCB concentration of 0.36 mg/kg was detected in sample TS20022; PCBs were not detected in the three other samples.

- Low concentrations of PCBs were detected in surface water sample TS30016, which was collected from 300 feet downstream of Removal Area 10B on May 1. According to the design report, there is no response action for surface water samples. Turbidity readings are used to determine the effectiveness of the turbidity curtain around a removal area. No elevated turbidity readings were recorded on May 1 or throughout excavation activities in Removal Area 10B.

- Two weekly surface water samples (TS30013 and TS30014) and 1 rinse blank sample (TS30015) were collected on April 24. Laboratory data were received on May 13. During extraction, the laboratory damaged all three samples. A backup sample was collected for TS30013 and TS30014; however no backup was collected for TS30015. As such, PCB data were available for the upstream and downstream samples, but not for the rinse blank.

Developments Anticipated During the Next Reporting Period

- During the week of June 2, the KRSG is scheduled to continue excavation activities in Removal Areas 10B, 11A, and 11B, complete removal of soil from three areas identified by MDEQ in Removal Areas 6B and 7B, begin installing an erosion control system in Removal Areas 6B and 7B, continue to operate the WCS, continue restoration activities in Removal Area 10A, complete the removal of the haul roads in Removal Areas 2 through 5, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of June 9, the KRSG is scheduled to continue excavation activities in Removal Areas 10B, 11A, and 11B, continue restoration activities in Removal Areas 9A and 10A, operate the WCS, install resuspension controls in Removal Area 12B, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of June 16, the KRSG is scheduled to continue excavation activities in Removal Areas 10B, 11A, and 12B, continue restoration activities in Removal Area 11B, host the Monthly Stakeholder's Meeting, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of June 23, the KRSG is scheduled to continue excavation activities in Removal Areas 10B, 11A and 12B, continue restoration activities in Removal Areas 11A and 11B, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of June 30, the KRSG is scheduled to continue excavation activities in Removal Areas 10B, 11A and 12B, continue restoration activities in Removal Area 11A, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- The KRSG will continue to submit the *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ in June.

- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in June.

- Throughout June, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #15, May 2008

Table A — Summary of Samples Collected and Data Received in May 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
					Soil Confirmation Samples				
TS20024	05/05/08	05/07/08	081720	KAR Labs	RA 9A, Grid 1 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20025					RA 9A, Grid 2 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20026					RA 9A, Grid 3 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
[TS20027]						PCBs	0 37 mg/kg	5 mg/kg	None
TS20028[1]			081723		RA 9A, Grid 4 (BS)	[PCBs]	[0 38 mg/kg]	[5 mg/kg]	[None]
APS-050508-16-SD/TS20028			***0805086***	***TriMatrix Laboratories***		***PCBs***	***0.17J mg/kg***	***5 mg/kg***	***None***
TS20029			081723	KAR Labs	RA 9A, Grid 1	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20030					RA 9A, Grid 2	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20031					RA 9A, Grid 3	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20032					RA 9A, Grid 4	PCBs	0 72 mg/kg	5 mg/kg	None
TS20033	05/06/08	05/07/08	081740	KAR Labs	Upland Area 10B1, Grid 6	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20034					Upland Area 10B1, Grid 7B	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20035					Upland Area 10B1, Grid 7C	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20036					Upland Area 10B1, Grid 8B	PCBs	4 3 mg/kg	5 mg/kg	None
TS20037					Upland Area 10B1, Grid 8A	PCBs	3 3 mg/kg	5 mg/kg	None
TS20038					Upland Area 10B1, Grid 7A	PCBs	0.55 mg/kg	5 mg/kg	None
TS20039					RA 10B, Grid 1 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20040		05/08/08	081775	KAR Labs	RA 10B, Grid 2 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20041					RA 10B, Grid 3 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20042	05/08/08	05/09/08	081797	KAR Labs	RA 9B, Grid 8 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20043		05/09/08	081804	KAR Labs	RA 10B, Grid 4 (TSCA material)	PCBs	0 41 mg/kg	5 mg/kg	None
TS20044[1]		05/09/08	081797	KAR Labs	RA 10B, Grid 5 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
APS-050808-17-SD/TS20044		***05/20/08***	***0805159***	***TriMatrix Laboratories***		***PCBs***	***< 0.63 mg/kg***	***5 mg/kg***	***None***
TS20045		05/09/08	081804	KAR Labs	RA 10B, Grid 6 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20046					RA 10B, Grid 7 (TSCA material)	PCBs	< 0 33 mg/kg	5 mg/kg	None
[TS20047]						PCBs	[< 0 33 mg/kg]	[5 mg/kg]	[None]
TS20048		05/09/08	081797	KAR Labs	RA 10B, Grid 8 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20049					RA 10B, Grid 7 (BS)	PCBs	0 35 mg/kg	5 mg/kg	None
TS20050					RA 10B, Grid 6 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20051					RA 10B, Grid 5 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None

see Notes on Page 4

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #15, May 2008

Table A — Summary of Samples Collected and Data Received in May 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Soil Confirmation Samples (Con't)									
TS20052[1]	05/14/08	05/15/08	081901	KAR Labs	RA 9A, Grid 5	PCBs	< 0 33 mg/kg	5 mg/kg	None
APS-051408-18-SD/TS20052		***05/20/08***	***0805307***	***TriMatrix Laboratories***		***PCBs***	***< 0.41 mg/kg***	***5 mg/kg***	***None***
TS20053		05/15/08	081901	KAR Labs	RA 9A, Grid 5 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20054					RA 9A, Grid 6	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20055					RA 9A, Grid 7	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20056					RA 9A, Grid 8	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20057					RA 9A, Grid 8 (BS)	PCBs	0 73 mg/kg	5 mg/kg	None
TS20058					RA 9A, Grid 6 (BS)	PCBs	0 43 mg/kg	5 mg/kg	None
TS20059					RA 9A, Grid 7 (BS)	PCBs	3 7 mg/kg	5 mg/kg	None
TS20060	05/21/08	05/22/08	082003	KAR Labs	RA 10A, Grid 2	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20061					RA 10A, Grid 1	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20062					RA 10A, Grid 3	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20063					RA 10A, Grid 4	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20064					RA 10A, Grid 1 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20065			082019	KAR Labs	RA 10A, Grid 5	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20066	05/29/08	05/30/08	082090	KAR Labs	RA 10B, Grid 10	PCBs	< 0 33 mg/kg	5 mg/kg	None
[TS20067]						PCBs	[< 0 33 mg/kg]	[5 mg/kg]	[None]
TS20068[1]					RA 10B, Grid 9	PCBs	< 0 33 mg/kg	5 mg/kg	None
APS-052908-19-SD/TS20068			***0805611***	***TriMatrix Laboratories***		***PCBs***	***0.37 mg/kg***	***5 mg/kg***	***None***
TS20069[1]			082107	KAR Labs	RA 11A, Grid 1	PCBs	2 6 mg/kg	5 mg/kg	None
APS-052908-20-SD/TS20069			***0805611***	***TriMatrix Laboratories***		***PCBs***	***0.90 mg/kg***	***5 mg/kg***	***None***
Surface Water Samples									
TS30010	04/17/08	05/07/08	TCRA 36	TAL	300' downstream of RA 9B	PCBs	<0 056 mg/L	-	None
TS30011					200' upstream of RA 9B	PCBs	<0 060 mg/L	-	None
TS30012					Rinse Blank	PCBs	<0 068 mg/L	-	None
TS30013	04/24/08	05/13/08	TCRA 38	TAL	300' downstream of RA 10B	PCBs	<0 065 mg/L	-	None
TS30014					200' upstream of RA 10B	PCBs	<0 065 mg/L	-	None
TS30015[2]					Rinse Blank	PCBs	-	-	None
TS30016	05/01/08	05/21/08	TCRA 40	TAL	300' downstream RA 10B	PCBs	0 051 mg/L[J]	-	None
TS30017					200' upstream RA 10B	PCBs	<0 050 mg/L	-	None
TS30018					Rinse Blank	PCBs	<0 047 mg/L	-	None

See Notes on Page 4

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #15, May 2008

Table A — Summary of Samples Collected and Data Received in May 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
					Surface Water Samples (Con't)				
TS30019	05/08/08	05/23/08	TCRA 42	TAL	300' downstream RA 10B	PCBs	<0 055 mg/L	-	None
TS30020					200' upstream RA 10B	PCBs	<0 047 mg/L	-	None
TS30021					300' downstream RA 9A	PCBs	<0 049 mg/L	-	None
TS30022					200' upstream RA 9A	PCBs	<0 047 mg/L	-	None
TS30023					Rinse Blank	PCBs	<0 066 mg/L	-	None
TS30024	05/15/08	05/30/08	TCRA 45	TAL	300' downstream RA 9A	PCBs	< 0 056 mg/L	-	None
TS30025					200' upstream RA 9A	PCBs	< 0 058 mg/L	-	None
[TS30026]						[PCBs]	< 0 057 mg/L	-	None
TS30027					Rinse Blank	PCBs	< 0 056 mg/L	-	None
TS30028	05/22/08	NR	NR	TAL	300' downstream RA 10A	PCBs	-	-	-
TS30029					200' upstream RA 10A	PCBs	-	-	-
TS30030					Rinse Blank	PCBs	-	-	-
TS30031	05/29/08	NR	NR	TAL	300' downstream RA 10A	PCBs	-	-	-
TS30032					200' upstream RA 10A	PCBs	-	-	-
TS30033					Rinse Blank	PCBs	-	-	-
					Wastewater Samples				
W_SA3S_Influ_0053	05/08/08	05/09/08	081803	KAR Labs	Staging Area 3S, Discharge 53, influent sample	PCBs	< 0 1 µg/L	-	-
W_SA3S_MidA_0048					Staging Area 3S, Discharge 53, midpoint sample, right side	PCBs	< 0 1 µg/L	-	-
W_SA3S_MidB_0052					Staging Area 3S, Discharge 53, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	-	-
W_SA3S_EffluA_0048					Staging Area 3S, Discharge 53, midpoint sample, right side	PCBs	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=1 35 mg/L, No Action Limit
W_SA3S_EffluB_0052					Staging Area 3S, Discharge 53, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 42 mg/L, No Action Limit
[W_SA3S_Dup_0012]						[PCBs, TSS, P]	[< 0.1 µg/L]	[Monthly Average of 2 6 x 10-5 µg/L]	[None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 43 mg/L, No Action Limit]

See Notes on Page 4

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #15, May 2008

Table A — Summary of Samples Collected and Data Received in May 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (Con't)									
W_SA4N_Influ_0001	05/16/08	05/19/08	081956	KAR Labs	Staging Area 4N, Discharge 1, influent sample	PCBs	< 0 1 µg/L	-	-
W_SA4N_MidA_0001					Staging Area 4N, Discharge 1, midpoint sample, right side	PCBs, TSS	< 0 1 µg/L	-	-
W_SA4N_MidB_0001					Staging Area 4N, Discharge 1, effluent sample, left side	PCBs	< 0 1 µg/L	-	-
W_SA4N_EffluA_0001					Staging Area 4N, Discharge 1, midpoint sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_EffluB_0001					Staging Area 4N, Discharge 1, effluent sample, left side	PCBs	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_Influ_0002	05/30/08	NR	NR	KAR Labs	Staging Area 4N, Discharge 2, influent sample	PCBs	-	-	-
W_SA4N_MidA_0002					Staging Area 4N, Discharge 2, midpoint sample, right side	PCBs, TSS, P	-	-	-
W_SA4N_MidB_0002					Staging Area 4N, Discharge 2, midpoint sample, left side	PCBs	-	-	-
W_SA4N_EffluA_0002					Staging Area 4N, Discharge 2, effluent sample, right side	PCBs, TSS, P	-	-	-
W_SA4N_EffluB_0002					Staging Area 4N, Discharge 2, effluent sample, left side	PCBs	-	-	-

Notes:
1 - Split sample collected by USEPA
2 - The sample bottle was broken during laboratory extraction
J - The compound was positively identified, however, the associated numerical value is an estimated concentration only
* USEPA split samples are shown in bold and italicized font
* Duplicate samples are shown in brackets
* Analytical results have not been validated

BS - bank sample
NR - not received
P - Phosphorus
PCBs - Polychlorinated Biphenyls
RA - Removal Area
TAL - TestAmerica Laboratories
TSS - Total Suspended Solids
mg/kg - milligrams per kilogram
mg/L - milligrams per liter
µg/L - micrograms per liter

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Mr. James Saric, Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Subject
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report
Area 1 – Morrow Dam to Plainwell Dam (May 2008)

INDUSTRIAL

Dear Jim:

Attached is the 15th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/ Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7 1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Michael J. Erickson, P.E.
Associate Vice President

Attachments

Copies
Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ (with Attachment A)
Jeff Keiser, CH2M HILL (with Attachment A)
J Michael Davis, Esq., Georgia-Pacific Corporation
Mellonie Fleming, Esq., Georgia-Pacific Corporation
David Guier, Millennium Holdings, LLC
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Paul Montney, P.E., Georgia-Pacific Corporation
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Mark Brown, Ph.D., Georgia-Pacific Corporation

Date
June 16, 2008

Contact
Michael J. Erickson, P.E.

Phone
810.225 1924

Email
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Our ref
B0064539 00014 #2

MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE SRI/FS AREA 1 (MORROW DAM TO PLAINWELL DAM)

REPORT #15, MAY 2008

PREPARED BY ARCADIS
JUNE 16, 2008

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #15, MAY 2008

Significant Developments and Activities during the Period, Including Actions Undertaken Pursuant to the AOC and SOW

- On May 5, ARCADIS transmitted to USEPA the Peer Review Scope of Work and the Charge to the Peer Review Panel (see Section 1.2.1.3 of the SOW). USEPA approved the Charge to the Peer Review Panel on May 6.

- On May 5, KRSG submitted a revised draft Risk Assessment Framework (RAF) to USEPA for approval.

- On May 6, USEPA forwarded to ARCADIS a copy of CH2M HILL's comments on the Plainwell No. 2 Dam Area investigation plan.

- On May 6, USEPA and ARCADIS participated in a conference call to discuss the revised and expanded draft investigation plan for the Plainwell No. 2 Dam Area.

- On May 6, ARCADIS submitted the Peer Review Charge and Supporting Materials to the Peer Review Panel.

- On May 7, USEPA approved the revised and expanded draft investigation plan for the Plainwell No. 2 Dam Area.

- On May 7, ARCADIS forwarded to USEPA the sampling locations and draft access letter for the upcoming Plainwell No. 2 Dam Area sampling.

- On May 7, ARCADIS forwarded to CDM the surface water data file from the Area 1 SRI Phase 1 Data Report.

- On May 8, ARCADIS sent out property access requests for Plainwell No. 2 Dam Area to local landowners.

- On May 9, MDEQ forwarded to ARCADIS its comments on the Multi-Area Feasibility Study (FS) documents.

- On May 13 and 14, the Peer Review Panel met for delivery of the Charge to the Peer Review Panel and a site tour.

- On May 15, USEPA transmitted to the Peer Review Manager comments from Jim Chapman (USEPA) as a follow up to the May 13 and 14 meeting.

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #15, MAY 2008

- On May 16, ARCADIS forwarded to the Peer Review Panel members a copy of MSU's presentation titled "Overview of Studies Conducted by MSU on the Kalamazoo River", MDEQ's presentation titled "Summary of Final Revised BERA", and a CD containing NOAA's Query Manager database.

- On May 21, USEPA transmitted to the Peer Review Manager questions from MDEQ regarding MSU's studies based on MSU's May 13 presentation to the Peer Review Panel.

- On May 21, USEPA approved the Ecological Risk Studies Peer Review SOW.

- On May 29, ARCADIS forwarded to USEPA the proposed SRI Phase 2 sampling plan for Portage Creek sediment core collection.

- Throughout May, the KRSG, USEPA and MDEQ discussed the disposal of historical archived sediment cores from Area 1. The KRSG awaits resolution of this issue.

- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.

- The KRSG awaits USEPA's comments on the Multi Area FS documents (Section 1.2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22.

- The KRSG awaits USEPA's approval of the Conceptual Site Model (CSM), which was submitted to USEPA on April 18.

- The KRSG awaits USEPA's approval of the Data Management Plan (DMP), which was submitted to USEPA on April 28.

- The KRSG awaits USEPA's approval of the proposed SRI Phase 2 sampling plan for Portage Creek sediment core collection, which was submitted to USEPA on May 29.

Data Collected and Field Activities Conducted During the Period

- In May, ARCADIS collected water column samples every other day at the upstream and downstream locations related to the Former Plainwell Impoundment Time-Critical Removal Action (TCRA). Table A summarizes the collected samples that were sent to TestAmerica Laboratories, Inc. for analysis. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.

- On May 20, ARCADIS forwarded to USEPA the schedule for upcoming Plainwell No. 2 Dam Area sampling

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #15, MAY 2008

- During the week of May 19, ARCADIS performed the following activities regarding the Plainwell No. 2 Dam Area sampling mobilization, established and checked survey control, installed and surveyed staff gauges, and staked sediment transects.

- During the week of May 26, ARCADIS staked out sampling locations in the Plainwell No. 2 Dam Area.

Laboratory Data Received During the Period

- In May, ARCADIS received laboratory data for the surface water samples collected between April 12 and May 16 (sample delivery groups [SDGs] TCRA35, TCRA37, TCRA39, TCRA41, TCRA43 and TCRA44). Table A presents a list of the samples for which data were received. The July 2008 monthly report will present the validated surface water data for these samples.

Problems

- None.

Actions Taken to Correct Problems

- None.

Developments Anticipated During the Next Two Reporting Periods

- In June, ARCADIS personnel are scheduled to perform the following activities related to the Plainwell No. 2 Dam Area: probe sediment, select sediment sample locations with USEPA, collect top-of-bank and floodplain soil samples, perform bank profile survey, and perform habitat assessment.

- In June, USEPA and KRSG will continue to correspond as necessary with the Peer Review Manager as needed to address questions from the panel (see Section 1.2.1.3 of the SOW).

- In June, ARCADIS will continue to work on the development of Phase 2 sampling plans for Area 1, as described in the Area 1 SRI/FS Work Plan.

- In July, ARCADIS will forward to USEPA the validated data for the surface water samples collected between March 27 and April 10 (SDGs TCRA32 and TCRA 33).

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #15, May 2008

Table A — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples Collected and Data Received in May 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30797	4/12/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30798	4/12/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30799	4/14/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30800	4/14/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30801	4/16/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30802	4/16/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30803	4/18/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30804	4/18/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30805	4/20/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30806	4/20/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30807	4/22/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30808	4/22/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30809[2]	4/24/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30810[2]	4/24/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30811	4/26/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30812	4/26/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30813	4/28/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30814	4/28/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30815 [K30816]	4/30/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30817[1]	4/30/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30818	5/2/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30819	5/2/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30820	5/4/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30821	5/4/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30822	5/6/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30823	5/6/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30824	5/8/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30825	5/8/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30826	5/10/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30827	5/10/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30828	5/12/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30829	5/12/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30830	5/14/2008	5/30/2008	TCRA44_SDSP	Farmer Street Bridge
K30831	5/14/2008	5/30/2008	TCRA44_SDSP	10th Street Bridge
K30832	5/16/2008	5/30/2008	TCRA44_SDSP	Farmer Street Bridge
K30833	5/16/2008	5/30/2008	TCRA44_SDSP	10th Street Bridge
K30834	5/18/2008	NR	--	Farmer Street Bridge
K30835	5/18/2008	NR	--	10th Street Bridge
K30836	5/20/2008	NR	--	Farmer Street Bridge
K30837	5/20/2008	NR	--	10th Street Bridge
K30838	5/22/2008	NR	--	Farmer Street Bridge
K30839	5/22/2008	NR	--	10th Street Bridge

See Notes on Page 2.